

**In the Matter of:**

**Jane Doe**

**v.**

**The University of Virginia, et al.**

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**Andrew C. Verzilli, M.B.A.**

September 9, 2024

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Andrew C. Verzilli, M.B.A.,

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9/9/2024

1 VIRGINIA

2 IN THE UNITED STATES DISTRICT COURT

3 FOR THE WESTERN DISTRICT OF VIRGINIA

4 Charlottesville Division

5 JANE DOE,

6 PLAINTIFF,

7 v.

8 THE UNIVERSITY OF VIRGINIA, et al.,

9 DEFENDANTS.

) CASE NUMBER:

) 3:23-cv-00018-RSB

10

11 Monday, September 9, 2024

12

13 Remote Deposition of

14 ANDREW C. VERZILLI, M.B.A.

15 a witness, called for oral examination by counsel for

16 the defendants, pursuant to notice and agreement of the

17 parties as to time and date, taken remotely, on the 9th

18 day of September 2024, beginning at 9:30 a.m., before

19 Jayne R. Kirby, a Certified Verbatim Reporter and

20 Notary Public in and for the State of Virginia, when

21 there were present on behalf of the respective parties:

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9/9/2024

1 Mr. Verzilli, can you see my screen?

2 A I can.

3 Q Do you recognize that document?

4 A Yes, and I think it should be seven pages.

5 Yeah, that's correct. Yeah, so that would be page one.

6 Q Okay, and is this the expert, proposed expert  
7 report you provided to Ms. Abdnour on June 12, 2024?

8 A Yes.

9 Q I would like to mark that as Defense Exhibit  
10 Number 2.

11 (The document referred  
12 to above was marked for  
13 identification as  
14 Defendant's Exhibit 2.)

15 BY MS. HENSLEY:

16 Q Up here in this first paragraph, "The  
17 following is our analysis of the loss in earnings  
18 relative to Jane Doe." So just to clarify here, you're  
19 intending to testify as to her lost earnings and  
20 nothing else; is that accurate?

21 A That's correct.

22 Q Within some discovery responses that we have

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9/9/2024

1 received from the Plaintiff's counsel, one of the  
2 answers indicated that, "Detailed information about  
3 economic damages related to loss of income and  
4 education are included in Andrew Verzilli's expert  
5 reports."

6 Are you intending to testify as well as to  
7 any related loss pertaining to Ms. Doe's education?

8 A I would -- the way I understand that is I had  
9 to make an assumption about Ms. Doe going to law  
10 school, or a delay in school. So that is an assumption  
11 I made, and then I had applied economics to what an  
12 attorney would earn compared to someone, you know, that  
13 wasn't an attorney, you know, a paralegal; or if there  
14 is a delay, you know, how long would it take her to,  
15 you know, fully mitigate.

16 I didn't -- I made an assumption about the  
17 education.

18 Q Okay. I also received in discovery an  
19 invoice of \$1,500 where you billed for preparation of a  
20 report in this case. Did you send an invoice for  
21 \$1,500 to Plaintiff's counsel in this case?

22 A That's right, and per federal rules I have to